

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

Case No.

Honorable:

vs.

Mag. Judge:

ROMARM/CUGIR MINI DRACO
Pistol CAL:762 SN:PE86792019RO and
GLOCK GMBH 23GEN4 Pistol
CAL:40 SN:BBBG721,

Defendants *in rem*.

Complaint for Forfeiture

Plaintiff, the United States of America, by and through Dawn N. Ison, United States Attorney for the Eastern District of Michigan, and Adriana Dydell, Assistant United States Attorney, states the following in support of this Complaint for Forfeiture:

Jurisdiction and Venue

1. This is an *in rem* civil forfeiture action under 18 U.S.C. § 924(d) related to a violation or violations of 18 U.S.C. § 922(g)(1) and/or 18 U.S.C. § 922(g)(1) together with 18 U.S.C. § 2.

2. This Court has original jurisdiction over this forfeiture action under 28 U.S.C. § 1345 because this action is being commenced by the United States of America as Plaintiff.

3. This Court has jurisdiction over this forfeiture action under 28 U.S.C. § 1355(b)(1)(A) and (B) because the acts giving rise to the forfeiture occurred in the Eastern District of Michigan and because the property was found in this district.

4. Venue is proper before this Court under 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to this action occurred in the Eastern District of Michigan.

5. Venue is also proper before this Court under 28 U.S.C. § 1395(b) because the Defendants *in rem* were found and seized in the Eastern District of Michigan.

Defendants *in rem*

6. The Defendants *in rem* consist of:

- a. ROMARM/CUGIR MINI DRACO Pistol CAL:762
SN:PE86792019RO; and
- b. GLOCK GMBH 23GEN4 Pistol CAL:40 SN:BBBG721

7. Federal law enforcement agents seized the Defendants *in rem* on February 7, 2024.

8. After seizure, the Defendants *in rem* were turned over to the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”).

Statutory Basis for Civil Forfeiture

9. Title 18 United States Code, Section 924(d) authorizes the civil forfeiture of the following:

- (1) [a]ny firearm or ammunition involved in or used in any knowing violation of subsection (a)(4), (a)(6), (f), (g), (h), (i), (j), or (k) of section 922 ... or any violation of any other criminal law of the United States, or any firearm or ammunition intended to be used in any offense referred to in paragraph (3) of this subsection ...

Factual Basis in Support of Forfeiture

10. The Defendants *in rem* were involved in a knowing violation or violations of 18 U.S.C. § 922(g)(1) and/or 18 U.S.C. § 922(g)(1) together with 18 U.S.C. § 2 and are therefore subject to federal forfeiture pursuant to 18 U.S.C. § 924(d). Evidence supporting forfeiture includes, but is not limited to, the following:

- a. On February 7, 2024, federal law enforcement agents executed a federal search warrant at a residence on Sawmill Blvd, Saginaw, Michigan in connection with an IRS investigation.
- b. Inside the residence, agents encountered Shannon Harris (“Harris”) who came to the door and was detained without

incident. Harris' girlfriend, Davana Harrison ("Harrison") and their daughter were also detained without incident.

- c. Harris showed law enforcement agents where the Defendants *in rem* were in the home.
- d. Harrison was interviewed during the seizure warrant execution and stated the following:
 - i. That the firearms found in the bedroom were both hers and both were registered to her. She had purchased them a few years ago, maybe 5 years ago from Sheridan Arms and Gander Mountain. She remembered one was a Glock but couldn't remember what the other one was.
 - ii. That she had not shot them in years, and they were locked but she didn't know where the key for the lock was and hadn't seen them since they moved.
 - iii. That she was unaware of any ammunition in the garage and that it must've been there from when they moved into the home in 2019. She was also unaware of ammunition located in the BMW trunk in the

driveway. She said they must've also been there from when she moved into the home.

iv. That she did shoot at the gun range at Sheridan Arms when she had her CPL, but it has since lapsed, and she needs to renew it. Sheridan Arms was the only gun range she said she had been to.

- e. Harris did not want to speak to law enforcement while at the residence. He did make several unsolicited statements when he saw the firearms case stating he was allowed to be around them because they were in a "locked safe," referring to a long gun case. He also requested the locks on the gun case be photographed.
- f. Harris is a felon and is therefore prohibited from possessing a firearm or ammunition under 18 U.S.C. § 922(g).
- g. Harrison has stated that she has been with Harris since they were both 17 years old and was aware he was a felon and not able to possess firearms.

Claim for Relief

11. Plaintiff re-alleges and incorporates by reference each and every allegation contained in Paragraphs 1 through 10.

12. The Defendants *in rem* are forfeitable to the United States of America under 18 U.S.C. § 924(d) because they were involved in a knowing violation or violations of 18 U.S.C. § 922(g)(1) and/or 18 U.S.C. § 922(g)(1) together with 18 U.S.C. § 2.

Conclusion and Relief

Plaintiff respectfully requests that this Court issue warrants for arrest of the Defendants *in rem*; that due notice be given to all interested parties to appear and show cause why forfeiture should not be decreed; that judgment be entered declaring the Defendants *in rem* condemned and forfeited to the United States for disposition according to law; and, that the United States be granted such further relief as this Court may deem just and proper, together with costs and disbursements of this action.

Respectfully submitted,

Dawn N. Ison
United States Attorney

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Dated: June 17, 2024

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JURY DEMAND

Plaintiff hereby demands a trial by jury.

Respectfully submitted,

Dawn N. Ison
United States Attorney

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Dated: June 17, 2024

VERIFICATION

I, Kyle McGraw, state that I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives. I have read the foregoing Complaint for Forfeiture and declare under penalty of perjury that the facts contained therein are true and correct based upon knowledge possessed by me and/or upon information received from other law enforcement agents.



SA Kyle McGraw, ATF

Dated: June 17, 2024